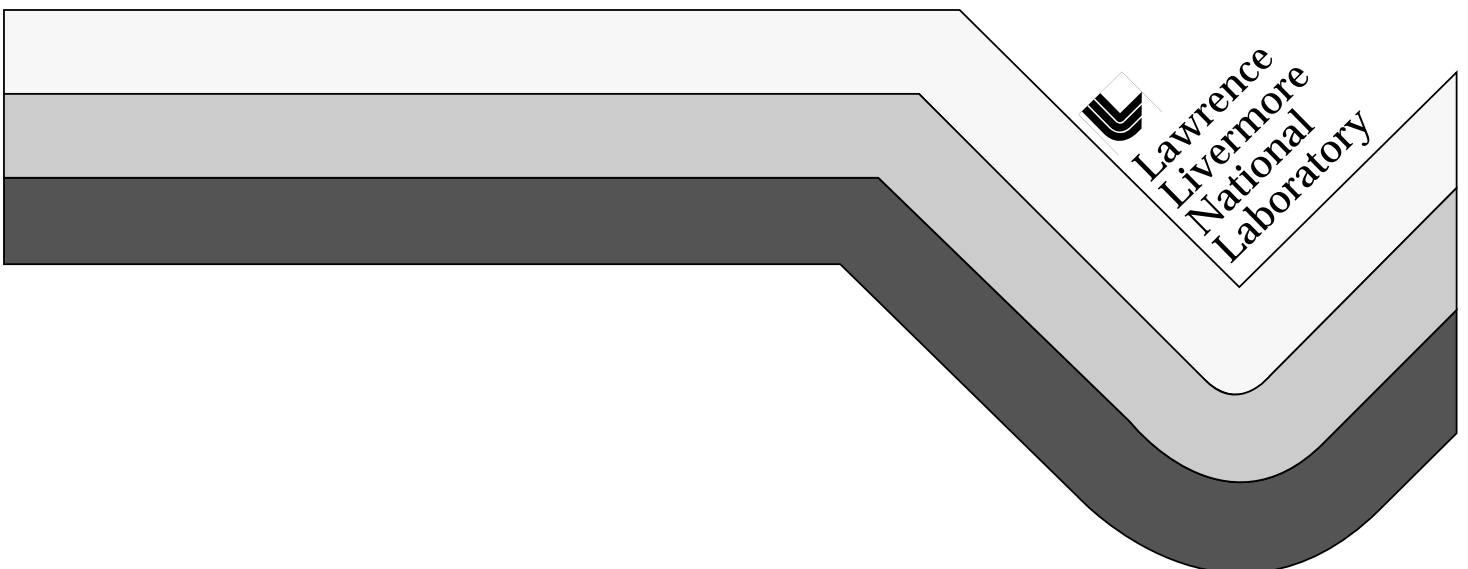


Assurance Review Office Policies and Procedures Manual Revision 1

Ronald E. Schwartz

September 1996



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September 1996

University of California



Prepared By:

Ronald E. Schwartz
Director, Assurance Review Office

Approved By:

Robert W. Kuckuck
Deputy Director for Operations



-i-
Table of Contents

1.	ARO CHARTER	-3-
2.	ARO OVERVIEW <ul style="list-style-type: none">• History• Mission• Functions• Organization	-4-
3.	ARO PHILOSOPHY AND PROCESSES <ul style="list-style-type: none">• Introduction• Philosophy• Process• Nuclear Facility Appraisals• Formal Appraisals	-7-
4.	COORDINATING DOE ES&H REVIEWS <ul style="list-style-type: none">• ARO's Responsibilities• Notifying Directorates of Reviews• Requesting Documents• Coordinating Briefings and Inspections• Coordinating Comments From Draft/Final Report	-14-
5.	ARO TECHNICAL STAFF RESPONSIBILITIES <ul style="list-style-type: none">• Introduction• ARO Director• Technical Staff	-17-
6.	TRAINING AND AUDITOR CERTIFICATION PROGRAMS <ul style="list-style-type: none">• Training Plan• Training Program• Auditor Certification	-21-

7.	DEFTRACK	-23-
	<ul style="list-style-type: none">• Introduction• External, Corporate, and ARO Assessments• Self-Assessments• Priority 1A and 1B Deficiency Items• DefTrack Software• ARO Responsibilities	
8.	COMPUTER USE POLICY	-25-
	<ul style="list-style-type: none">• Foreword• Policy and Security Rules• Sensitive Data• Password Management• Software• Use of Computer Systems	
9.	ARO FILEROOM	-27-
	<ul style="list-style-type: none">• Fileroom and Reference Library• Reading File• Administrative Files• Appraisal Files	



1. Charter

Charter - Assurance Review Office (4/18/96)

The Assurance Review Office (ARO) is the Laboratory's institutional-level environmental, safety, and health (ES&H) oversight organization reporting to the Deputy Director for Operations. The ARO's role is to conduct independent reviews of LLNL's ES&H and related quality assurance systems, including nuclear facility operations and the directorate self-assessment processes.

The ARO evaluates the adequacy of existing ES&H systems relative to the Laboratory's ES&H policies and procedures and applicable ES&H laws, regulations, and directives. The results of the ARO's reviews are communicated to the Deputy Director for Operations, directorates, nuclear facility management, and ES&H support organizations with the intent of facilitating improvements in LLNL's ES&H, nuclear facility safety, self-assessment, and institutional oversight programs.

The ARO is responsible for independently assessing conformance with LLNL's nuclear safety implementation plans prepared in accordance with the Price-Anderson Amendments Act rules.

The ARO maintains the institutional ES&H deficiency tracking system (DefTrack) to monitor actions taken in response to its evaluations and assessments conducted by outside agencies and the directorates.

In addition to its oversight responsibilities, the ARO serves as a point of contact and coordinating agent for DOE and University of California ES&H reviews, appraisals, and audits.

The ARO is precluded from assuming any line or programmatic responsibilities in order to ensure functional independence and appropriate segregation of responsibility.

Approved:

Robert W. Kuckuck
Deputy Director for Operations



2. The Assurance Review Office - An Overview

History

The Assurance Review Office (ARO) was established in August 1990 by the Deputy Director of LLNL for the purpose of assisting him in carrying out his responsibilities relative to the Laboratory's environmental, safety, and health (ES&H) programs. The ARO was chartered to provide institutional-level oversight of ES&H and related quality assurance systems including the directorate self-assessment processes.

The Nuclear Facilities Safety Office (NFSO) was established by the Deputy Director of LLNL in April 1993 in response to DOE Order 5480.5, *Safety of Nuclear Facilities*¹, and DOE Order 5482.1B, *Environmental, Safety, and Health Appraisal Program*. The NFSO incorporated the responsibilities of the Nuclear Facility Safety Committee (NFSC) which had previously been formed to conduct independent appraisals of LLNL nuclear facilities.

The Assurance Review Office and Nuclear Facility Safety Office were combined effective February 1, 1996 with the intent of increasing the efficiency and effectiveness of the institutional-level oversight of the Laboratory's ES&H systems and nuclear facility operations. Concurrently, the NFSC was dissolved.

Mission

The ARO's mission is to assist the Laboratory's Deputy Director for Operations in discharging his Environmental, Safety, Health, and related Quality Assurance (ES&H/QA) responsibilities by providing independent, institutional-level oversight of LLNL's ES&H systems and nuclear facility safety. The ARO also serves as a point of contact and coordinating agent for DOE and University of California ES&H reviews, appraisals, and audits.

Functions

- Conduct reviews of ES&H and related quality assurance systems in the directorates to verify work is conducted in conformance with applicable ES&H laws, regulations, and directives as incorporated into LLNL policies and procedures.

¹ Canceled by DOE Notice 1321.140, *Cancellation of Directives*, dated 5/20/94.

- Perform safety evaluations of LLNL's nuclear facilities to verify conformance with applicable policies, procedures, and provisions of LLNL's nuclear safety implementation plans.
- Evaluate the contents of LLNL's ES&H manuals, documents, and databases to assess whether contractual and regulatory requirements are being satisfied.
- Perform a triennial review of LLNL's nuclear criticality safety program.
- Communicate to the Deputy Director for Operations, directorates, nuclear facility management, and ES&H support organizations the results of evaluations with the intent of facilitating improvements in LLNL's ES&H, nuclear facility safety, self-assessment, and institutional oversight programs.
- Maintain the institutional ES&H deficiency tracking system (DefTrack) and monitor actions taken in response to ARO's evaluations, assessments conducted by outside agencies, and self-assessments performed by the directorates.
- Fulfill the requirement specified in LLNL's *Health and Safety Manual*, Supplement 2.04, ES&H Self-Assessment Program, "to compile and maintain a list of required directorate self-assessments."
- Serve as a point of contact and coordinating agent for DOE and University of California ES&H reviews, appraisals, and audits.

Organization

The ARO reports to the Deputy Director for Operations. The ARO Director is responsible for the management of the ARO and supervision of the ARO staff, consultants, and subcontractors. *Figure 1* illustrates the organizational placement of the ARO.

Assurance Review Office Organization

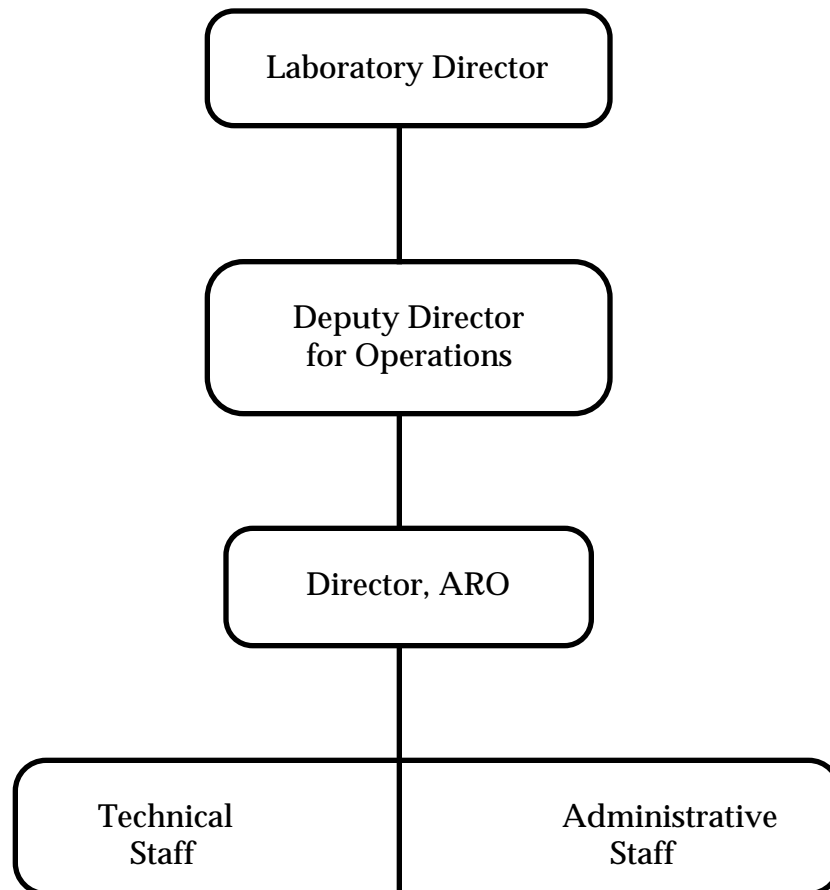


Figure 1



3. ARO Philosophy and Processes

Introduction

Operating under the terms of Contract 48, the President of the University of California has delegated to the Laboratory Director authority to manage the Laboratory.

The Director has in turn delegated to the Associate Directors (ADs) the direct responsibility for conducting the Laboratory's programmatic work, and primary responsibility for implementing the Laboratory's ES&H policies in the performance of that work.

LLNL's ES&H support organizations, managed by the AD for Plant Operations, are responsible for developing and maintaining institutional systems, such as LLNL's ES&H manuals, and assisting the directorates in understanding and meeting ES&H requirements.

To provide independent verification that ES&H requirements are being met, and to assess whether current ES&H systems are adequate to meet evolving requirements, ES&H "assurance" offices have been created at both the directorate and institutional levels. Within each directorate an Assurance Manager, with direct access to his/her AD, monitors implementation of the ES&H program by the line organizations.

At the institutional level, the Deputy Director for Operations has responsibility for providing independent oversight to assure the implementation of ES&H requirements. The ARO was created and is maintained to assist the DDO in carrying out this specific responsibility.

The mission of the ARO is to provide independent appraisals of the Laboratory's ES&H program, including the directorates' ES&H self-assessment processes and nuclear facility safety. This mission is achieved through a combination of system reviews, ES&H manual reviews, field audits and checks, reviews of self-assessment plans and reports, DefTrack and Occurrence

Reporting analyses, and the monitoring of complex-wide issues. Fundamentally, the ARO's role is to serve as an early warning system for the identification of weaknesses in LLNL's ES&H, nuclear facility safety, and ES&H self-assessment programs. The ARO's products from its oversight activities are: 1) identification of issues and vulnerabilities requiring attention, and 2) independent confirmation and documentation that ES&H-related systems are working as intended.

In addition to its oversight activities, the ARO performs the institutional-level functions of maintaining the ES&H deficiency tracking system (DefTrack) code, institutional-level DefTrack database, and DefTrack policies and procedures.

The ARO supports the ES&H Working Group through active participation on the Working Group's subcommittees, formulation of DefTrack policy and procedure recommendations, and by compiling and maintaining a list (*i.e.*, the AIR List) of required directorate self-assessments per the provisions of *Health & Safety Manual*, Supplement 2.04.

Philosophy

The ARO operates on the precept that it can be most successful in its mission if it works as a partner (*i.e.*, cooperatively and constructively) with the directorates, ES&H support organizations, and DOE/OAK staff. The ARO, therefore, seeks to maintain open and positive communications with each of the directorates and ES&H support organizations, as well as DOE managers and staff, believing this will enhance the ability of the responsible Laboratory managers to further understand and strengthen LLNL's ES&H program.

The ARO has multiple customers, each of which has a vital role in ensuring the overall success of LLNL's ES&H program. The DDO is the ARO's sponsor and ultimate customer. The ARO's products for the DDO are analyses delineating the strengths and weaknesses of LLNL's ES&H program and nuclear facility safety.

In that primary responsibility resides with the directorates for implementing LLNL's ES&H policies, the ARO views its first-line customers to be the directorate Assurance Managers, ES&H support organization managers, and nuclear facility managers. The ARO's products for these customers are ES&H system analyses of their respective operations, prompt notification of perceived weaknesses and issues, and recognition of successes.

Process

The ARO holds that the starting point when performing an oversight role is the development of a clear understanding of the systems in place for the operations being assessed. To facilitate this process, the ARO's technical staff is organized into four teams with the responsibility for developing an understanding of the ES&H systems associated with specific directorates.

Assignments:

ARO Team 1: Defense & Nuclear Technologies, Physics & Space Technology

ARO Team 2: Engineering, Energy, Director's Office

ARO Team 3: Chemistry & Materials Science, Biology & Biotechnology, Environmental Programs, Lasers

ARO Team 4: Plant Operations, Non-proliferation, Arms Control and International Security (NAI), Computation

The ARO team members are charged with developing documentation (*i.e.*, work papers) of the ES&H systems and processes in place within the directorates. These ES&H system reviews provide a basis for identifying ES&H program strengths and weaknesses and more efficiently and effectively evaluating conformance with requirements. Perceived weaknesses and issues are brought first to the attention of the cognizant Assurance Manager so that the responsible line organization may initiate appropriate corrective actions. Situations entailing risk to the institution are brought to the attention of the Deputy Director for Operations.

The ARO Director regularly solicits input from the Deputy Director for Operations' office, ARO staff, and ES&H Working Group members to determine areas particularly appropriate for review, and the sizing and timing of appraisal efforts. The ARO Director also seeks frequent input from LLNL operational managers, consultants, and DOE/OAK staff regarding areas of current concern, sensitivity, or perceived vulnerability.

As a tool for evaluating previous appraisal activities, the ARO maintains a database delineating by subject area all institutional-level and external ES&H reviews which have been performed since 1990.

Performance and risk are primary factors in determining the frequency and intensity of oversight activities. In order to more effectively assess performance and risk factors, ARO personnel regularly review, analyze, and trend the information contained in the LLNL institutional DefTrack and Occurrence Reporting (ORPS) databases. On a semi-annual basis the LLNL occurrence reports in the ORPS database are sorted by “nature of occurrence” and “category of causes,” and are examined for trends. On a quarterly basis, occurrence reports from other national laboratories are sorted and compared. An annual “Deficiency Tracking System Trends Report” is prepared by the ARO and issued to the members of the ES&H Working Group and the Deputy Director for Operations.

By utilizing input from all of the sources cited above, the ARO Director is able to make strategic plans relative to near and long term appraisal efforts. Proposals for specific reviews are then discussed with the DDO’s office.

The ARO is responsible for communicating the results of its reviews of the DefTrack database to the responsible directorate(s), ES&H Working Group, and/or the Deputy Director for Operations, as appropriate.

Nuclear Facility Appraisals

A primary function of the ARO is to conduct independent appraisals of LLNL’s nuclear facility safety and safety-related documentation. As part of this function, the ARO is responsible for independently assessing conformance with LLNL’s nuclear safety implementation plans prepared in accordance with the Price-Anderson Amendments Act rules.

The ARO’s appraisals of nuclear facility safety and safety-related documentation are conducted in a formal manner with frequencies consistent with mandated requirements. The results of these appraisals are documented as formal reports and provided to the responsible facility management, directorate Assurance Managers, and the DDO.

Formal Appraisals

Appraisal teams consist of members knowledgeable of the requirements related to the specific area being reviewed. Teams may include personnel from programmatic and ES&H

organizations, the Quality Assurance Support Office, Laboratory Counsel, and outside contractors and consultants. Team members may not be directly involved in the operations of the subject activity or facility, nor are they to be in a position in which a conflict of interest prevents them from conducting a fair appraisal or assessment.

The key elements of the ARO's formal appraisals are:

- Defining the Scope of the Review
- Review Preparation
- Conducting the Review
- Documentation
- Follow-up

Defining the Scope of the Review

The scope of each formal appraisal is defined by the ARO. The following factors are considered when determining the scope of an appraisal:

- Laboratory requirements.
- Previous appraisals and assessments.
- Issue(s) of specific concern.
- Number of facilities or activities encompassed by the review.

Review Preparation

Each formal appraisal is to have a written plan describing the following:

- Objective and scope of work.
- Identification of specific facilities and/or requirements to be reviewed.
- List of team members.
- List of personnel to be interviewed.
- List of documents and procedures to be reviewed, including previous reviews and appraisals.

- Criteria against which the facilities and/or activities are to be judged.

Conducting the Review

Each formal appraisal is to be conducted in accordance with the scope of work. Initial activity consists of the collection and review of relevant documents by the team members. This is followed by a field investigation and interviews.

The Team Leader is responsible for scheduling the facility tours and personnel interviews with the appropriate point(s) of contact (POC).

After assembling and assimilating the data collected from the field investigations and personnel interviews, the appraisal team holds an exit meeting before drafting a report. This meeting allows the POC and facility/program personnel an early opportunity to comment on the factual accuracy of the findings and observations.

Draft copies of the appraisal report are also provided to facility/program management for an additional factual accuracy review before the report is finalized.

Documentation

The written report is to be based on the scope of work. The report is to summarize the scope and activities of the appraisal effort, and describe the results of the appraisal.

The results of safety appraisals performed by the ARO are categorized into findings, concerns, noteworthy practices, and suggestions. These terms and their applicability are defined below.

- A finding is a statement of fact regarding a condition of non-compliance with a requirement. A formal response is required.
- A concern is a statement of opinion regarding a perceived vulnerability. This could include situations involving less than optimal performance and/or a condition that if not corrected could lead to a non-compliance with a requirement. A formal response is not required, but strongly recommended.
- A noteworthy practice is an activity or process recognized as highly effective or innovative. No response is required.

- A suggestion is a possible action or practice that in the opinion of the appraisal team constitutes a viable option to achieve process or performance improvement. Suggestions are not findings nor concerns and do not require a response. A suggestion is not intended to preempt management from considering or selecting other options.

When a formal response is required, corrective action(s) and implementation schedule(s) are to be entered into the Laboratory's deficiency tracking system (DefTrack) by the responsible organization.

Follow-up

ES&H deficiencies uncovered in formal assessments and self-assessments are to be tracked using the DefTrack database. The deficiencies are to be entered into the database by the responsible directorate. (The assigned directorate also has the responsibility for tracking through completion, verification, and close-out of action plan items.) Consistent with the criteria specified in the *DefTrack Policy and Procedures Manual*, the directorate is to roll-up to the ARO appropriate DefTrack items. This roll-up database becomes the "official" DefTrack database for LLNL. The ARO is responsible for monitoring corrective actions associated with its formal appraisals through periodic reviews. The ARO is also responsible for maintaining a list of its on-going and completed appraisals.



4. Coordinating DOE ES&H Reviews

In general, the ARO serves as the Laboratory's central point of contact for appraisals by the University and the DOE. The Price-Anderson Amendments Act Project Manager serves in this capacity for the Defense Nuclear Facilities Safety Board (DNFSB). The AD for Plant Operations may manage and/or coordinate the response to Laboratory-wide ES&H and QA appraisals, assessments, audits and inspections by the DOE, the University, and other agencies.

ARO's Responsibilities

As the designated point of contact for DOE ES&H reviews, the ARO is responsible for facilitating the coordination of formal review activities and the flow of information between the DOE and the directorates. These activities include the following:

- Notifying directorates of appraisals/reviews.
- Forwarding requests for documents.
- Coordinating
 - briefings and inspections.
 - comments made on the draft and final reports.

Notifying directorates of reviews

The ARO notifies affected directorates of the review through their Assurance Managers. Assurance Managers may be verbally notified of informal reviews. A notification letter is sent to all directorates for formal reviews.

Requesting documents

The ARO notifies the cognizant directorate of any DOE request for documents. The directorate sends the documents to the ARO, which in turn creates a copy for its files and forwards the documents to the DOE. For tracking purposes, the ARO is to be provided with the title of any document that is given directly to a DOE requester.

Coordinating briefings and inspections

The ARO is responsible for:

- Coordinating with the DOE to determine the appropriate content of a briefing and to develop a schedule.
- Facilitating the selection of appropriate LLNL speakers.
- Sending notices of the briefings to representatives of cognizant directorates.
- Coordinating with the Assurance Manager of the cognizant directorate to establish technical contacts for inspections.

Coordinating comments from draft/final report

The DOE usually publishes both a draft report and a final report of its findings and recommendations. The purpose of the draft report is to obtain comments on the factual accuracy of the findings.

Draft Report - The ARO sends a copy of the draft report to the cognizant directorates. The directorates comment on the factual accuracy of the report and forward their comments to the ARO. The ARO compiles the comments and forwards a consolidated response to the DOE. (As noted, for Laboratory-wide appraisals, the AD for Plant Operations may fulfill this role.)

Final Report - ARO is responsible for:

- Sending a copy of the final report to all cognizant directorates.
- Conferring with representatives from cognizant directorates to determine and assign each itemized deficiency in the final report. Directorates are responsible for developing an action plan addressing the findings, entering the appropriate information into their deficiency tracking system, and rolling up all items to the ARO DefTrack database. (As noted, for Laboratory-wide appraisals, the AD for Plant Operations may fulfill aspects of this role.)
- Integrating the information the directorates rolled up to the ARO in a final report and forwarding it to the DOE under a letter of transmittal.
- Sending a copy of the completed report to each directorate.

Follow-up reports - The ARO is responsible for:

- Developing the required follow-up reports from updated DefTrack data and forwarding these reports to the DOE under a letter of transmittal.
- Sending copies of the follow-up reports to directorates.



5. ARO Technical Staff Responsibilities

Introduction

The responsibilities for the technical staff members of the ARO are described below.

ARO Director

The ARO Director reports to the Deputy Director for Operations. The ARO Director is responsible for:

- Managing an office chartered with conducting institutional-level reviews of LLNL's environmental, safety, and health systems and nuclear facility safety. This includes identifying, documenting, and reporting on a timely basis to senior management vulnerabilities in LLNL's ES&H, nuclear facility safety, self-assessment, and oversight processes.
- Ensuring that LLNL's ES&H deficiency tracking system (DefTrack) is maintained and that analyses of the institutional DefTrack database are performed and reported to the ES&H Working Group members and the DDO on a regular basis.
- Serving as a point of contact and coordinating agent for DOE and University of California ES&H reviews, appraisals, and audits.
- Ensuring that the terms and conditions of support contracts, covering technical services to assist the ARO in carrying out its oversight responsibilities, are fulfilled.
- Stewardship of the ARO's staff, financial, equipment, and facility resources. Responsibilities include: maintaining a work environment which is in compliance with LLNL ES&H policies and applicable ES&H regulations; meeting established commitments for equal employment opportunity, affirmative action, and workforce diversity; meeting security, classification and business and property management standards and requirements; accomplishing assigned tasks within the established budget and schedules.

Technical staff

The ARO technical staff consists of qualified persons who serve as team leaders and team members for ARO reviews. The qualifications and certifications of each ARO technical staff member is documented in the "Audit Personnel Qualification Record" maintained by the ARO senior administrator.

Each ARO technical staff member has been assigned the following duties and responsibilities:

1. Conduct reviews of ES&H and related quality assurance systems in their assigned directorates to verify work is conducted in conformance with applicable ES&H laws, regulations, and directives as incorporated into LLNL policies and procedures.
2. Perform safety evaluations within assigned nuclear facilities to verify conformance with applicable policies, procedures, and provisions of LLNL's nuclear safety implementation plans.
3. At the direction of the ARO Director, evaluate the contents of LLNL's ES&H manuals, documents, and databases to assess whether contractual and regulatory requirements are being satisfied.
4. At the direction of the ARO Director, perform special crosscutting or institutional ES&H-related analyses.
5. Effectively communicate the results of evaluations, including identified issues and vulnerabilities.
6. Represent LLNL in interactions with external reviewers and DOE contacts.
7. Maintain technical/professional skills.
8. Maintain knowledge of the attributes of LLNL's ES&H program.

The following constitute the expectations and success criteria for the ARO technical staff members:

1. Develop work papers and collect supporting documentation that credibly demonstrate when ES&H systems are working as intended.

Technical staff, continued

2. Identify and effectively evaluate issues and vulnerabilities of consequence.
3. Communicate information resulting from reviews and analyses to decision makers in a manner that contributes to their understanding of ES&H issues, vulnerabilities, and potential consequences.
4. Work effectively with other ARO staff members to ensure that office and institutional priorities are successfully addressed.
5. Support and assist co-workers in a manner that contributes to the successful accomplishment of their duties.
6. Maintain open and positive communications with assigned directorates and support organizations in order to facilitate the identification of ES&H program strengths and weaknesses.
7. Interact with external personnel in a manner that enhances confidence in LLNL's institutional oversight activities and provides a means for identifying issues of sensitivity to the sponsor.
8. Effectively represent the ARO in institutional settings (e.g., ES&H Working Group, subcommittees, and presentations).
9. Develop professional and technical skills.
10. Develop knowledge of the attributes and accomplishments of LLNL's ES&H program.
11. Display the highest standards of professionalism, integrity, and confidentiality in performing duties.
12. Provide personal initiative and leadership in fulfilling assigned duties and responsibilities.

The following reflect the performance appraisal and ranking criteria for the ARO technical staff members:

Assignment content/value - These elements reflect the responsibility, authority, difficulty, and impact of an individual's assignment. Factors include:

Technical staff, continued

- Degree of impact on ES&H oversight
- Responsibilities and authority
- Complexity/difficulty of assignments
- Visibility and contacts (internal & external)
- Special projects

Performance - Factors include:

- Productivity
- Quality of work produced
- Leadership
- Reliability
- Problem solving
- Initiative and ingenuity
- Interpersonal skills
- Judgment/decision making
- Management of time and resources
- Communication

Competencies (Skills, Knowledge, and Abilities) - Technical skills and behaviors highly valued by the organization. Examples include specific areas of technical expertise, effective management and leadership, and demonstrated proficiency in using career-long learning and development to enhance capability and potential. Factors include:

- Technical/administrative ability and professional growth
- Leadership and initiative
- Communication and interpersonal skills
- Decision making
- Education/experience
- Ingenuity/creativity
- Knowledge of organization
- Planning and organizing
- Technical expertise (broad and specific)



6. Training and Auditor Certification Programs

Training Plan

The ARO Training Plan (maintained in a separate stand-alone document) outlines the training prescribed for ARO employees. The ARO's Training Plan is integral to the ARO mission and has been developed to ensure that employees are trained and qualified to perform their work assignments. ARO technical staff members who may be exposed to hazardous conditions will be given training appropriate for the hazards. New hires into the ARO technical staff will be individually evaluated for training needs with regard to base skills and required training.

Key objectives of the ARO training plan are to:

- Identify and document all job-related training required by Laboratory management or outside authorities. This includes identifying the training required to perform nuclear facility safety appraisals by staff members performing such reviews.
- Provide mechanisms to assure required training is accomplished.
- Provide appropriate training information to the Director's Office Training Coordinator to be recorded in LLNL's Laboratory Repository of Completed Courses (LROCC) database, as required by the *Director's Office Staff Training Program Plan*.
- Ensure that the plan is reviewed and revised as needed to reflect new training requirements.
- Provide for continuous training to maintain technical expertise.

**Training
Program**

The Assurance Review Office (ARO) has defined its training requirements consistent with the direction given in the *LLNL Training Program Manual*. The Director's Office records and documents show successfully completed training in both internal and external courses.

**Auditor
Certification**

The ARO has an auditor certification program for all of its technical staff members. Auditor qualifications and training are documented. Each technical staff member is recertified as a qualified auditor on an annual basis by the ARO Director. A file is maintained for each ARO technical staff member and includes copies of the employee's resume, job description, list of successfully completed training courses, professional affiliations, audit activity, and audit certification documents.



7. DefTrack

Introduction

ES&H deficiencies identified in all formal appraisals and self-assessments are to be tracked using the LLNL deficiency tracking system (DefTrack) database. The deficiencies are to be entered into the database by the responsible directorate. The assigned directorate also has the responsibility for tracking action plan items. Consistent with the criteria specified in the *DefTrack Policy and Procedures Manual*, the directorate is to roll-up to the ARO appropriate DefTrack items. This roll-up database becomes the “official” DefTrack database for LLNL.

External, Corporate, and ARO Assessments

The ARO tracks reported deficiencies from each external, corporate, and ARO assessments through close-out.

Tracking includes:

- Reviewing the action plan for completeness and adequacy of response.
- Maintaining the document files in the ARO fileroom.
- Verifying that the action plan is correctly entered into the DefTrack system by the responsible directorate.
- Tracking progress of action items to assure that items are completed and closed out in a timely manner.
- Preparing routine update reports on the progress of the close-out.
- Transmitting, as necessary, letters to all directorate Assurance Managers to remind them when actions are late, or of errors found in the DefTrack database.
- Closing out the inspection when all items have been closed.
- For external appraisals, quarterly DefTrack updates are sent to DOE/OAK.

Self-Assessments

Tracking of self assessments are the responsibility of the directorates involved. The ARO will on occasion verify that proper procedures and documentation of self-assessment deficiencies are maintained in the directorate’s DefTrack database.

Priority 1A and 1B**Deficiency Items**

ARO personnel review Priority 1A or 1B items after each DefTrack roll-up. Each 1A and 1B deficiency is examined to see if the record clearly documents that it satisfies the defined requirements. Specific tasks carried out are:

- Review of the item description and action plan for completeness and adequacy response.
- Verify that the recorded dates (Item Date, Inspection Date, Completion Date) confirm that required actions or mitigation measures have been completed in the required time period.
- Contact directorate Assurance Managers, as necessary, to clarify the documentation and verify that the record is correct.

DefTrack Software

The ARO is responsible for the DefTrack software, including any changes or modifications. The ARO supplies DefTrack software and the current version of supporting database tables to the directorates. In performing these functions, the ARO is supported and advised by the DefTrack Users Group which is composed of DefTrack Administrators from each of the directorates.

ARO**Responsibilities**

The ARO's responsibilities for administering DefTrack include:

- Managing DefTrack software and quality assurance of the system.
- Chairing the DefTrack Users Group.
- Obtaining ES&H Working Group approval of DefTrack policy modifications.
- Coordinating development and documentation of DefTrack policies, procedures, and operations.
- Managing the DefTrack software change process, including compiling change requests, evaluating the changes, and implementing approved changes.
- Managing and documenting software testing.
- Formally releasing software upgrades and controlling dissemination to the directorates.



8. Computer Use Policy

Foreword

The ARO makes extensive use of desktop computers and associated interoffice, Lab-wide, and Internet communication networks. This section contains the ARO Computer Use Policy and Procedures.

Policy and Security Rules

It is the policy of the Assurance Review Office that all personnel will adhere to the *LLNL Computer Use Policy and Security Rules* set forth by the Computer Security Organization. These policies and rules advise LLNL personnel on computer use, user accountability, unauthorized access, software license, password and user IDs, malicious software, altering authorized access, denial of service actions, data modification or destruction, reconstruction of information or software, network registration, modems, dial-up and remote access, sensitive and critical operations, misuse, abuse, and criminal activities for their computer systems.

Sensitive Data

It is the policy of the ARO that all machines that have unclassified sensitive data will adhere to the following procedures:

- 1) Protect the hard disk from any unwelcome intrusions by installing a disk locking password protection utility. This utility will lockout the disk at shut down and will only unlock the disk when the proper password is issued at startup.

An alternative to hard disk password protection is not to store sensitive unclassified data on the system's hard drive but on removable media (floppy disk or a removable hard drive) that can be stored in a safe place.

- 2) Screen savers will be used with password protection to guard against intruders looking at or manipulating data files when the user is not at his/her computer terminal.

**Password
Management**

It is recommended that users select an eight-character password, avoid dictionary words and any personal names. ARO may periodically review passwords for vulnerability to cracking. It is recommended that users change their passwords a minimum of once a year.

Users are cautioned to protect and never share passwords. Each user is held accountable for the use of ARO computing resources under their assigned password. Users are not to place passwords in any form in an electronic file. Passwords are to be changed immediately if compromised.

Software

All software (freeware, shareware, or commercially produced software) being used on ARO computers must be appropriately acquired (bought, or in the case of freeware/shareware, acquired properly from an open source) and used according to the appropriate licensing agreement.

**Use of Computer
Systems**

This office is adhering to the definitions on misuse, abuse, and criminal use of computer systems set forth by the Computer Security Organization in their publication *LLNL Computer Use Policy and Security Rules*.



9. ARO Fileroom

Fileroom and Reference Library

The ARO maintains reference documents for use by ARO personnel, subcontractors working under contract to ARO, audit and appraisal teams, and other interested LLNL personnel with a need-to-know. The reference documents include pertinent institutional ES&H/QA records, DOE Orders, and state and federal ES&H codes and regulations, etc. Prior to filing any material, all items are logged into a database, and are then assigned an accession number. Material is then usually routed through the ARO's reading file. After remaining in the reading file for one month, the material is either filed or distributed to the appropriate ARO person for further action or retention.

When a particular document is needed from the filing system, an "out card" is completed by the person taking the document and filed in place of the document, until it is returned to the file.

Examples of filed subject matter are: DOE Orders, standards, notices, documents; LLNL institutional policies and procedures manuals, safety manuals, records of appraisals, incident analyses, etc.; building files (safety documents for individual nuclear facilities); other reference books, and documents from outside LLNL.

Material contained in the ARO fileroom is kept indefinitely for historical purposes. The ARO fileroom and reference material does not leave the ARO facility at LLNL.

Reading File

Two separate, in-house reading files are maintained in the Assurance Review Office -- a main "Reading File," and a "Daily Clips" file.

Reading File, continued

The Reading File contains various items (e.g., LLNL memoranda, DOE bulletins, LLNL Occurrence Reports, etc.) which are of interest to the ARO staff. The file is purged monthly. Most of the items taken out of the folder are then filed in the ARO fileroom or central office files.

The *Daily Clips* file consists solely of the Laboratory publication of the same name. This file contains news articles gathered from around the world wherein LLNL has either been cited in the article or where a particular topic is of interest to LLNL employees.

Administrative Files

Files pertaining to day-to-day administration of ARO are maintained in ARO administrative files. The subject categories in this file include visitor badge requests, travel requests, business machines maintenance, telephone operations requests, procurement activities, ARO correspondence, personnel information, etc. These files are arranged alphabetically by subject.

Appraisal Files

Appraisal files are maintained in the ARO for each ES&H audit and appraisal conducted at LLNL for which ARO plays a role. Included in an audit/appraisal file is: original notice of intent to conduct audit or appraisal, scope of work, requested document list and copies of such documents, if appropriate; agendas and contact list, attendance sheets for in- and out-briefings, biographies of auditors, correspondence, security clearance information, building access, logistical information, draft report on findings, factual accuracy reports to draft report, final report, action plan. Technical staff members are responsible for placing appraisal related documents and work papers in the appropriate appraisal file. The ARO senior administrator is responsible for gathering the appropriate documentation and information, and ensuring that the appraisal files are a thorough and complete file of individual appraisal activity. The appraisal files are retained indefinitely for historical purposes.